DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

COMMAND AUDIT OF SANTA ANA AREA



FINAL REPORT

OCTOBER 23, 2009

Memorandum

Date:

October 23, 2009

To:

Office of the Commissioner

Attention: Commissioner J. A. Farrow

From:

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

Office of the Assistant Commissioner, Inspector General

File No.:

005.9968.A13471.010

Subject:

FINAL 2008 COMMAND AUDIT REPORT OF SANTA ANA AREA

In accordance with the Institute of Internal Auditors, *International Standards for the Professional Practice of Internal Auditing* §2440, issued by the Institute of Internal Auditors, Government Code §13887 (a)(2), and the California Highway Patrol (CHP) Audit Charter, I am issuing the 2008 Command Audit Report of the Santa Ana Area. The audit focused on the command's cash receipts, contracts, evidence, purchasing, reimbursable services, asset forfeiture program, fleet operations, and personnel records.

The audit revealed the command has adequate operations. However, some issues were observed. This report presents suggestions for management to improve on some of its operations. In doing so, operations would be strengthened and the command would ensure it is operating in compliance with policies and procedures. We have included our specific findings, recommendations, and other pertinent information in the report. The Santa Ana Area agreed with all of the findings and plans to take corrective action to improve its operations. The command will be required to provide quarterly updates to the Office of Inspections on the progress of their corrective action plan implementation until the command has resolved all deficiencies. Also, the Office of Inspections plans on conducting a follow-up review within one year from the date of the final report.

Additionally, in accordance with the *International Standards for the Professional Practice of Internal Auditing* and Government Code §13887 (a)(2), this report, the response, and any follow-up documentation is intended for the Office of the Commissioner; Office of the Assistant Commissioner, Field; Office of the Assistant Commissioner, Inspector General; Border Division, Office of Legal Affairs; Office of Inspections; and the Santa Ana Area. Please note this report restriction is not meant to limit distribution of the report, which is a matter of public record pursuant to Government Code §6250 et seq. Furthermore, in accordance with the Governor's Executive Order S-20-90 to increase government transparency, the final audit report, including the response to the draft audit report, will be posted on the CHP's internet website, and on the Office of the Governor's webpage, located on the State's Government website.

Office of the Commissioner Page 2 October 23, 2009

The Office of Inspections would like to thank the Santa Ana Area's management and staff for their cooperation during the audit. If you need further information, please contact Assistant Chief Ken Hill at (916) 843-3005.

M. C. A. SANTIAGO

Assistant Commissioner

cc: Office of the Assistant Commissioner, Field

Border Division

Office of Legal Affairs

Office of Inspections

Santa Ana Area

BUSINESS, TRANSPORTATION AND HOUSING AGENCY DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

COMMAND AUDIT OF SANTA ANA AREA

OFFICE OF INSPECTIONS, AUDITS UNIT OCTOBER 23, 2009

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Executive Summary

The Commissioner has the responsibility, by statute, to enforce laws regulating the operation of vehicles and use of highways in the State of California and to provide the highest level of safety, service, and security to the people of California. Consistent with the California Highway Patrol's (CHP) 2008 Audit Plan, the Office of the Commissioner directed the Office of Inspections, Audits Unit, to perform an audit of a command selected by each Division. The Border Division selected the Santa Ana Area.

The CHP's 2008-2009 Strategic Plan highlights the mission statement which includes five broad strategic goals designed to guide the CHP's direction. One strategic goal is to continuously look for ways to increase the efficiency and/or effectiveness of departmental operations.

The audit scope period covered the twelve months prior to the start of the audit field work. However, to provide a current evaluation of the command, primary testing was performed of business conducted during the period of January 1, 2008 through June 30, 2008.

Based on the review of the Santa Ana Area's operations, this audit revealed the Santa Ana Area has complied with most operational policies; however, some issues were observed. The following is a summary of the identified issues:

Cash Receipts

- The command's Petty Cash Reimbursement Requests were not completed and authorized as required.
- The command did not transmit cash receipts timely.

Note: It is the Office of Inspections' opinion that the finding related to the command's untimely transmittal of cash receipts is of high risk to the CHP.

Contracts

- The command obtained services prior to the approval of some X-Number contracts.
- The command's X-Number contract invoices did not always contain the required information.

Evidence

• The command did not properly update and maintain its evidence database.

Driving Under the Influence (DUI) Cost Recovery Program

• The command's internal controls over the DUI Cost Recovery (Reimbursable) Program were inadequate.

Asset Forfeiture Program

- The command did not perform annual asset forfeiture training.
- Each quarter the command did not prepare Quarterly Open Asset Forfeiture Case Status Reports.
- The Area commander or his/her designee did not sign and date the Asset Forfeiture Log.
- The command did not forward asset forfeiture case file reports and other related documents timely.

Please refer to the Findings and Recommendation section for detailed information.

Audit Report

INTRODUCTION

To ensure the California Highway Patrol's (CHP) operation is efficient and/or effective and internal controls are in place and operational, the Office of the Commissioner directed the Office of Inspections, Audits Unit, to perform an audit of a command selected by each Division. The Border Division selected the Santa Ana Area.

The CHP's 2008-2009 Strategic Plan highlights the mission statement which includes five broad strategic goals designed to guide the CHP's direction. One strategic goal is to continuously look for ways to increase the efficiency and/or effectiveness of departmental operations. This audit will assist the CHP in meeting its goal.

OBJECTIVE AND SCOPE

The objective of the evaluation is to determine if the command has complied with operational policies and procedures that provide managers with reasonable, but not absolute, assurance departmental operations are being properly executed. The audit period was twelve months prior to the start of the audit field work. However, to provide a current evaluation of the command, primary testing was performed of business conducted during the period of January 1, 2008 through June 30, 2008. This audit included the review of existing policies and procedures, as well as, examining and testing recorded transactions, to determine compliance with established policies, procedures, and good business practices. The audit field work was conducted from October 20 - 24, 2008.

METHODOLOGY

Each Division commander selected one command to be audited regarding their cash receipts, contracts, evidence, purchasing, reimbursable service contracts, and advanced payments for predetermined services. Additionally, the Division commander could select any of the following topics: asset forfeiture, fleet operations, personnel records, and strategic plan reporting. The Border Division commander selected asset forfeiture, fleet operations and personnel records. When preparing for the audit, and due to limited auditing resources, reimbursable service contracts was reduced to an examination of the Driving Under the Influence (DUI) Cost Recovery Program and advanced payments for predetermined services was reduced to Wide Load Services. Also, the audit of evidence was limited to guns, drugs, and money. Sample selection of areas to be audited was primarily random or judgmental. Whenever possible, the use of risk assessment was used to select a sample containing the highest probability of risk to the command. Furthermore, the auditors reviewed prior audit reports and findings.

OVERVIEW

Cash Receipts: Compliance with cash receipt policies appears adequate. However, the command's Petty Cash Reimbursement Requests were not completed and authorized as required. Also, the command did not transmit cash receipts timely. It is the opinion of the Office of Inspections that the finding related to the command's untimely transmittal of cash receipts is of high risk to the CHP.

Contracts: Contracts appear to be processed according to departmental policies, but some issues were present. The command obtained services prior to the approval of some X-Number contracts and X-Number contract invoices did not always contain the required information.

Evidence: Evidence appears to be processed according to departmental policies, but could be improved. The command did not properly update and maintain its evidence database.

Purchasing: Purchases appear to be handled according to departmental policy.

DUI Cost Recovery Program: The command's DUI Cost Recovery Program could be improved. The command's internal controls over the DUI Cost Recovery (Reimbursable) Program were inadequate.

Wide Load Services: The command did not provide any Wide Load Services during the audit period. Therefore, this audit did not review Wide Load Services.

Asset Forfeiture Program: The Asset Forfeiture Program appears adequate, but some issues were present. The command did not perform annual asset forfeiture training; each quarter the command did not prepare Quarterly Open Asset Forfeiture Case Status Reports; (Area commander or his/her designee) did not sign and date the Asset Forfeiture Log; and did not forward asset forfeiture case file reports and other related documents timely.

Fleet Operations: Fleet operations appear to be processed according to departmental policies.

Personnel Records: Personnel records appear to be processed according to departmental policies.

This audit revealed the command has adequate operations; nevertheless, issues were discovered. These issues should be addressed by management to maintain the command's compliance with appropriate laws, regulations, policies, and procedures. The findings and appropriate recommendations are presented in this report.

As a result of changing conditions and the degree of compliance with policies and procedures, the efficiency and effectiveness of operations change over time. Specific limitations may hinder the efficiency and effectiveness of an otherwise adequate operation include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, fraud, and management overrides. Establishing compliant and safe operations and sound internal controls would prevent or reduce these limitations; moreover, an audit may not always detect these limitations.

$F_{ ext{INDINGS}}$ and $R_{ ext{ECOMMENDATIONS}}$

CASH RECEIPTS

FINDING 1:

The command's Petty Cash Reimbursement Requests were not

completed and authorized as required.

Condition:

From July 18, 2007 to September 7, 2008, the command submitted four Petty Cash Reimbursement Requests, CHP 264. However, during this time period, the command should have submitted eleven CHP 264s since

expenditures were greater than \$10.00.

Criteria:

Highway Patrol Manual (HPM) 11. 2, Materials Management Manual, Chapter 2, Change Funds and Petty Cash, paragraph 11.a. states:

"11. Request for Reimbursement.

a. A list of receipts and/or STD. 439s shall be prepared in triplicate on CHP 264 at least monthly if over \$10.00, quarterly if under \$10.00, and on June 30 of each fiscal year. When completing reimbursement information on the CHP 264, double space between the information for each invoice date; do not type any information through the vertical lines (refer to Annex 2-B-1)."

Recommendation:

The command should comply with departmental policy by preparing and authorizing the CHP 264 form on a monthly basis when the petty cash receipts are greater than \$10.00.

FINDING 2:

The command did not transmit cash receipts timely.

Condition:

The command possesses two safes that are available to secure evidence items; both safes are located inside the Area's secured evidence room. However, the safes have been kept open and unlocked because of combination problems. During the audit, it was discovered the command had ten outstanding evidence money cases (E20070125, E20030257, E20030263, E20030397, E20040188, E20050119, E20050259, E20050343, E20060101, and E20070262) totaling \$9,978.25 in currency. Also, the owners for these ten cases cannot be located or the owner is unknown. Though the money from these cases has been kept in the command's safes, the money has been in the safes for several years and not transmitted to the Department's Fiscal Management Section (FMS).

Criteria:

HPM 11.1, Administrative Procedures Manual, Chapter 4, Miscellaneous

Sales – Transmittal of Collections, paragraph 11.a.(3) states:

"(3) Close of business each Thursday. The weekly transmittal period for all offices begin on Friday and ends at close of business the following Thursday."

Recommendation:

The command should submit cash receipts in accordance with departmental policy (e.g., currency assets in the command's possession, having no evidentiary value, should be transmitted to FMS).

CONTRACTS

FINDING 1:

The command obtained services prior to the approval of some X-Number contracts.

Condition:

For the audit period, the command generated thirteen X-Number contracts. Ten of the thirteen X-Number contracts were reviewed. The review of ten X-Number contracts revealed only two X-Number contracts, 07-675-184 and 07675-267, disclosed the services, although not deemed emergency, were started prior to the execution or issuance of the contract.

Criteria:

HPM 11.1, Administrative Procedures Manual, Chapter 23, Delegation of X-Number Contract Authority, paragraph 2.a. states:

"2. PROHIBITIONS.

a. Obtaining an X Number after services are rendered."

Recommendation:

The command should comply with departmental policy prohibiting the non-emergency service until the contract is approved.

FINDING 2:

The command's X-Number contract invoices did not always contain the required information.

Condition:

For the audit period, the command generated thirteen X-Number contracts. Ten of the thirteen X-Number contracts were reviewed. The review of ten X-Number contracts revealed eight X-Number contract files, 07-675-139, 07-675-148, 07-675-187, 07-675-226, 07-675-240, 07-675-184, 07-675-255, and 07-675-0267, had incomplete invoices. Specifically, the files were missing the date stamped invoice identifying the received date and the postmarked envelope.

Criteria:

Government Code (GC) Section 927(b) states:

"It is the intent of the Legislature that state agencies pay property submitted, undisputed invoices within 45 days of receipt, or automatically calculate and pay the appropriate late payment penalties as specified in this chapter."

HPM 11.1, Administrative Procedures Manual, Chapter 24, Payment of Invoices, paragraph 3.a.(3) through 3.a.(3)(c)2 states:

"3. POLICY.

- (3) Every command shall establish a system of tracking invoices submitted for payment. Each command should designate a responsible employee to ensure every invoice is reviewed and approved by the commander or an authorized designee and that invoices are submitted to FMS (Fiscal Management Section) only once.
 - (a) Interest penalty charges will automatically be paid to the vendor if the invoice is not paid (or properly disputed) within the specified time period.
 - (b) Invoices shall be date stamped by commands upon receipt. Additionally, the envelope in which the invoice arrived shall be attached to the invoice. Some vendors mail their invoices several days after the invoice date; therefore, it is necessary to identify the postmark date.
 - (c) Commands shall forward the following items to FMS within three (3) business days of receipt:
 - 1 Approved invoices.
 - $\underline{2}$ Envelopes of invoices which reflect the postmark date."

Recommendation:

The command should date stamp the X-Number contract invoices upon receipt to identify the received date and retain the postmarked envelope to verify when the invoices were mailed.

EVIDENCE

FINDING 1:

The command did not properly update and maintain its evidence database.

Condition:

The command did not properly update and maintain its Area Information System (AIS), evidence items. Specifically, the classifications for identifying guns, monies, and drugs were not accurately reflected in the AIS. The guns, monies, and drugs should be classified respectively as "G," "M," and "D" or left blank instead of using the following: P, F, A, S or E.

Criteria:

SAM Section 5300.3 states:

"Each agency must provide for the proper use and protection of its information assets. Accordingly, each agency must perform the following:

- 1. Assign management responsibilities for information technology risk management, including the appointment of an Information Security Officer. See SAM Section 5315.
- 2. Provide for the integrity and security of automated and paper information, produced or used in the course of agency operations. See SAM Section 5350."

SAM Section 5310 states:

"The purpose of information security policy is to establish and maintain a standard of due care to prevent misuse or loss of state agency information assets. Policy provides management direction for information security to conform with business requirements, laws, and administrative policies. Each agency must provide for the integrity and security of its information assets by establishing appropriate internal policies and procedures for preserving the integrity and security of each automated, paper file, or data base including:

1. Establishes and maintains management and staff accountability for protection of agency information assets."

HPM 40.4, Information Security and Administration Manual, Chapter 1, General, paragraph 1.a. states:

"1. PURPOSE.

a. <u>Information Assets</u>. The state's information assets are an essential public resource. The unauthorized destruction, tampering, modification, deletion, or disclosure of information included in agency files and databases can compromise the integrity of state programs, violate individual rights to privacy, and constitute a criminal act. Accordingly, the Department must assume responsibility for the proper classification, use, and protection of its automated information."

HPM 40.4, Information Security and Administration Manual, Chapter 1, General, paragraph 2.a. through 2.b.(3) states:

"2. POLICIES AND PROCEDURES.

- a. The CHP is responsible for ensuring its information technology assets are protected from damage, destruction, and unauthorized or accidental modification, deletion, access, or disclosure.
- b. Pursuant to the requirements of State Administrative Manual (SAM) Section 4840, et al., internal policies and procedures are necessary in the following areas:

- (1) Assignment of management responsibilities for information technology risk management.
- (2) Appointment of a Department Information Security Officer (ISO).
- (3) Provision for the integrity and security of automated information produced or used in the course of agency operations."

Recommendation:

The command should update and maintain its AIS database in accordance with State and departmental policy.

DRIVING UNDER THE INFLUENCE (DUI) COST RECOVERY PROGRAM

FINDING 1:

The command's internal controls over the DUI Cost Recovery (Reimbursable) Program were inadequate.

Condition:

A review of twelve randomly selected Incident Response Reimbursement Statement forms, CHP 735, and the corresponding Daily Field Record forms, CHP 415, disclosed the following instances of non-compliance:

- 1. Five of the twelve CHP 735 forms that recorded billable hours did not reconcile with the applicable CHP 415 forms.
- 2. Four of the twelve CHP 735 forms did not record the Blood Alcohol Concentration (BAC) result of the involved parties, as required by departmental policy.

Criteria:

SAM Section 20050 states:

"State entity heads, by reason of their appointments, are accountable for activities carried out in their agencies. This responsibility includes the establishment and maintenance of internal accounting and administrative controls. Each system an entity maintains to regulate and guide operations should be documented through flowcharts, narratives, desk procedures, and organizational charts. The ultimate responsibility for good internal control rests with management."

HPM 11.1, Administrative Procedures Manual, Chapter 20, DUI Cost Recovery Program, paragraph 4.a. states:

"4. AREA RESPONSIBILITIES.

a. <u>Local Procedures</u>. Area offices shall develop local procedures to ensure that a CHP 735, Incident Response Reimbursement Statement, is prepared for each arrest that meets the cost recovery criteria (refer to Annex A)."

HPM 11.1, Administrative Procedures Manual, Chapter 20, DUI Cost Recovery Program, paragraph 4.b.(1) through 4.b.(2)(c) states:

- "(1) Completed CHP 735s, Incident Response Reimbursement Statements, based on Section A (refer to Annex B) shall be forwarded to the Fiscal Management Section (FMS), Reimbursable Services Unit, within ten business days of one of the following dates:
 - (a) The date BAC results of .08% or greater are received.
 - (b) The date BAC results of .04% or greater are received for a commercial driver.
- (2) Completed CHP 735s, Incident Response Reimbursement Statements, based on Section B (refer to Annex C) shall be forwarded to FMS, Reimbursable Services Unit, within ten business days of the notification of a conviction of CVC Sections 23152, 23153, or greater offense as a result of one of the following:
 - (a) In the case of a refusal.
 - (b) An arrest for drugs only.
 - (c) A BAC of less than .08%."

Recommendation:

The command should ensure CHP 735 forms' that record billable hours reconcile with the appropriate CHP 415 forms and that the CHP 735 forms are completed and processed in accordance with State and departmental policy.

ASSET FORFEITURE PROGRAM

FINDING 1: The command did not perform annual asset forfeiture training.

Condition: Annual asset forfeiture training for supervisors, officers, and affected non-uniformed personnel was not performed at least once a year.

Criteria: HPM 81.5, Drug Programs Manual, Chapter 2, Asset Forfeiture Program, paragraph 21.a., 21.b., and 21.c. states:

"21. ASSET FORFEITURE TRAINING.

a. In order to ensure uniformity throughout the Department, Division AFCs shall receive annual training from the departmental AFC coordinator in FSS. The training will encompass asset forfeiture laws, pending state and/or federal legislation relating to asset forfeiture, departmental policies, and procedures. Division

AFCs will in turn provide annual training to Area AFCs, uniformed employees assigned to NTFs, canine handlers, and affected non-uniformed employees involved with asset forfeiture. The training shall be of sufficient duration to ensure full understanding of legal/policy requirements. In addition, Division AFCs should attend Division Area Commanders' Conferences as necessary to provide commanders with an overview of the Department's AFC and any related new legislation or updates to departmental policy.

- b. Area AFCs shall provide training for Area supervisors, officers, and affected non-uniformed personnel at least once a year. Area AFCs shall ensure officers are made aware of local MOUs with allied agencies/NTFs regarding turnover of arrests for controlled substance violations and are familiar with the legal requirements and departmental policies/procedures related to the seizure of assets.
- c. Area and Division commanders shall ensure that AFCs and their alternates attend all locally required training in asset forfeiture procedures when such training is provided by the district attorney's office. In addition, the California District Attorneys' Association sponsors asset forfeiture classes each year. Class information is available through the internet on the California District Attorneys' Association web site (www. CDAA.org), or by calling the California District Attorneys' Association in Sacramento at (916) 443-2017. Commanders are encouraged to include these classes in their annual Departmental Out-Service Training plans."

Health and Safety Code Section 11469(e) states:

"Seizing agencies shall implement training for officers assigned to forfeiture programs, which training should be ongoing."

Recommendation:

The command should comply with the departmental policy for annual asset forfeiture training.

FINDING 2:

Each quarter the command did not prepare Quarterly Open Asset Forfeiture Case Status Reports.

Condition:

The command's Asset Forfeiture Coordinator (AFC) did not prepare the first and second quarter reports of 2008 as required. Specifically, the reports detail the status of all open asset forfeiture cases and are eventually forwarded to the Division AFC.

Criteria:

HPM 81.5, Drug Programs Manual, Chapter 2, Asset Forfeiture Program, paragraph 18.c. states:

"18. QUARTERLY STATUS REPORT OF OPEN ASSET FORFEITURE CASES.

c. Area AFCs shall prepare a report detailing the status of their open asset forfeiture cases, and the report shall be forwarded to their Division AFC by the 30th of the month following the end of the quarter. Area AFCs may report case status via memorandum summarizing the status of open asset forfeiture cases (Annex 2-V-1 and 2-V-2) or may report case status directly on the printout of open asset forfeiture cases, at the discretion of the Division AFC. A copy of the case status reporting document shall be filed with each referenced asset forfeiture case for audit purposes."

Recommendation:

Each quarter the command should prepare the Quarterly Status Reports of Open Asset Forfeiture Cases and forward the reports to the Division AFC.

FINDING 3:

The Area commander or his/her designee did not sign and date the Asset Forfeiture Log.

Condition:

The Area commander or his/her designee did not sign and date the CHP 309 Form, Asset Forfeiture Log (side 2, Commander's monthly review), indicating the log had been reviewed as required by departmental policy.

Criteria:

HPM 81.5, Drug Programs Manual, Chapter 2, Asset Forfeiture Program, paragraph 9.b.(8) states:

"9. <u>AREA ASSET FORFEITURE COORDINATOR</u> RESPONSIBILITIES.

- b. Following are specific responsibilities associated with this position:
 - (8) Ensure all asset forfeiture cases are entered on a CHP 309, Asset Forfeiture Log. The CHP 309 and CHP 309, side 2 (Commander's Monthly Review), shall be routed to the Area commander on the first of each month for review. The Area commander of his/her designee shall sign and date the CHP 309, side 2, indicating the log has been reviewed."

Recommendation:

The Area commander or his/her designee should sign and date the Asset Forfeiture Log monthly.

FINDING 4:

The command did not forward asset forfeiture case file reports and other related documents timely.

Condition:

A review of four asset forfeiture case files (2007-675, 2007-675-175, 2007675-188, and 2007-675-229) showed the required reports and related documents were not sent to the Office of Primary Interest (Field Support Section) through the Division AFC within twenty days from the asset forfeiture incident, seizure date. The auditor also observed delayed filings of these reports anywhere from two to seven months from the asset forfeiture incident, seizure dates.

Criteria:

HPM 81.5, Drug Programs Manual, Chapter 2, Asset Forfeiture Program, paragraph 9.b.(7) states:

"9. <u>AREA ASSET FORFEITURE COORDINATOR</u> RESPONSIBILITIES.

- b. Following are specific responsibilities associated with this position:
 - (7) Establish a case file for each asset forfeiture arrest/incident. Forward all reports and related documents to FSS though the Division AFC within 20 days from the date of the seizure/incident. The Department's assigned asset forfeiture case number shall be printed on the face page of all documents in the top right corner."

Recommendation:

The command should forward the required asset forfeiture case file reports and other related documents in a timely manner.

Conclusion

Based on the review of the command's operation, this audit revealed the command has adequate operations; however, some issues were observed. This report presents suggestions for management to improve on some of its operations. In doing so, the command would operate in accordance with departmental policies and procedures.

ANNEX A

Memorandum

Date:

September 22, 2009

To:

Border Division

From:

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

Santa Ana Area

File No.:

675.13314.12488

Subject:

SANTA ANA AREA 2008 COMMAND AUDIT REPORT

This memorandum addresses the findings outlined in the Command Audit Report memorandum dated August 28, 2009. The Command Audit was conducted from October 20 – 24, 2008.

Findings and Recommendations:

<u>Cash Receipts</u>: The Area concurs with the findings and has addressed the processing of monies. Both items have been addressed and corrective measures have been implemented to preclude a future recurrence of this type.

<u>Contracts</u>: The Area concurs with the both findings. Both items have been addressed and corrective measures have been implemented to preclude a future recurrence of this type.

Evidence: The Area concurs with the finding and has expanded the use of the AIS database system. The Area has begun to update and streamline its evidence processing to preclude a future recurrence of this type.

<u>DUI Cost Recovery</u>: The Area concurs with the finding. The Area has implemented a more stringent review and processing standard to preclude a future recurrence of this type.

Asset Forfeiture: The identified issues were noted and the Area concurs. All items have been addressed and corrective measures have been implemented to preclude a future recurrence of this type.

S. A. SECHRIST, Captain

Commander

Attachments